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Attorneys for Defendants

**UNITED STATES DISTRICT COURT
FOR THE CENTRAL DISTRICT OF CALIFORNIA**

JENNY LISETTE FLORES; *et al.*,

Case No. CV 85-4544-DMG

Plaintiffs,

V.

WILLIAM P. BARR, Attorney
General of the United States; *et al.*,

Defendants.

**JOINT REPORT AND REQUEST
FOR EXTENSION OF HEARING
DATE RE ECF NO 550:**

[Proposed] Order

1 On May 28, 2019, Plaintiffs filed a Motion for Award of Attorneys' Fees
2 and Costs in the above-captioned case (ECF No. 545). Plaintiffs set that motion for
3 hearing before the Court on June 28, 2019. The Court dismissed that motion
4 because Plaintiffs' counsel failed to comply with L.R. 7-3 in advance of filing.
5 Plaintiffs subsequently filed an amended motion (ECF No. 550) on June 7, 2019
6 after having complied with L.R. 7-3. The Court set the motion for hearing on July
7 5, 2019. The parties then stipulated to continue the hearing date for Plaintiffs'
8 motion for two weeks to July 19, 2019. In granting that extension, the Court
9 ordered that by June 28, 2019 "one of the following must occur: (a) the parties
10 must file a joint status report indicating whether they have settled Plaintiffs'
11 Motion for Attorneys' Fees or require additional time to do so, (b) Defendants
12 shall file a Statement of Non-Opposition to Plaintiffs' Motion for Attorneys' Fees,
13 or (c) Defendants shall file an Opposition to Plaintiffs' Motion for Attorneys'
14 Fees." Order, ECF No. 561.

15 The parties hereby report that they need additional time to discuss whether
16 resolution of the EAJA motion will be possible with the need for further litigation.
17 Counsel for Defendants have made an offer to counsel for Plaintiffs, and counsel
18 for Plaintiffs has stated that he needs further time to consider that offer.
19 Accordingly, the parties ask that the Court extend the hearing date, and related
20 briefing dates, by a further two weeks so that the parties may continue these
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1 discussions. The hearing date would therefore be set for August 2, 2019. Counsel
2 for Defendants has conferred with counsel for the Plaintiffs who joins in this joint
3 report.
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5 DATED: June 27, 2019

/s/ Peter Schey (with permission)

PETER SCHEY
Center for Human Rights
and Constitutional Law

8
9 *Attorney for Plaintiffs*

10 DATED: June 27, 2019

11 JOSEPH H. HUNT
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Attorneys for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on June 27, 2019, I served the foregoing pleading on all counsel of record by means of the District Clerk's CM/ECF electronic filing system.

/s/ Sarah B. Fabian
SARAH B. FABIAN
U.S. Department of Justice
District Court Section
Office of Immigration Litigation

Attorney for Defendants